

United States District Court
Southern District of New York

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Westminster Securities Corporation,
David R. Holbrooke, M.D, AWM Holdings,
LLC and John O'Shea,

15 Civ. 04181(VM)

Plaintiffs,

v.

Uranium Energy Corporation and
UEC Concentric Merge Corporation,

Defendants.

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Plaintiffs' Initial Rule 26(a)(1) Disclosures

Pursuant to Fed. R. Civ. P. Rule 26(a)(1), Plaintiffs Westminster Securities Corporation, David R. Holbrooke, M.D, AWM Holdings, LLC and John O'Shea provides their Initial Disclosures based upon their current knowledge. Plaintiffs reserves the right to amend and/or supplement these disclosures.

I. (a)(1)(A)(i) the name and the address and telephone number of individuals likely to have discoverable information that Plaintiffs may use to support their claims and the subject of the information they may have. Plaintiffs have provided contact information to the best of their current knowledge.

1. Rockwell Hankin - 2342 Rock Creek Drive, Charlotte, NC 2822 - issuance of 877,000 shares on August 12, 2009 and April 10, 2010, merger of UEC and CEC, exchange of UEC Warrants for CEC Warrants
- Richard Graff - 2339 Woodbury Lane, Evergreen CO, 80439 - issuance of 877,000 shares on August 12, 2009 and April 10, 2010, merger of UEC and CEC, exchange of UEC Warrants for CEC Warrants
- Ronald Parratt - 2190 Augusta Avenue, Reno, NV 89509 - issuance of 877,000 shares on August 12, 2009 and April 10, 2010, merger of UEC and CEC, exchange of UEC Warrants for CEC Warrants
- Andrew Simpson - issuance of 877,000 shares on August 12, 2009 and April 10, 2010 merger of UEC and CEC, exchange of UEC Warrants for CEC Warrants
- Lynn Oates - 4625 Tumbleweed Drive, Cave Creek, AZ 85331 - issuance of 877,000 shares on August 12, 2009 and April 10, 2010, merger of UEC and CEC, exchange of UEC Warrants for CEC Warrants
- Ralph Kettell - 25214 Firewood Lane, Spring TX 77373 - issuance of shares in April 2010, merger between UEC and CEC, exchange of UEC Warrants for CEC Warrants
- Amir Adnani - merger of UEC and CEC, exchange of UEC Warrants for CEC Warrants
- Mark Katsumata - merger of UEC and CEC, exchange of UEC Warrants for CEC Warrants

Alan Lindsay - merger of UEC and CEC, exchange of UEC Warrants for CEC

Warrants

Harry Anthony - merger of UEC and CEC, exchange of UEC Warrants for CEC

Warrants

Erik Essiger - merger of UEC and CEC, exchange of UEC Warrants for CEC

Warrants

Vincent Della Volpe - merger of UEC and CEC, exchange of UEC Warrants for CEC

Warrants

David Kong - merger of UEC and CEC, exchange of UEC Warrants for CEC

Warrants

Kevin Smith - Traxis Group, 825 Third Avenue, New York, NY 10022 - value of

CEC shares

John O'Shea - 100 Wall Street, New York, NY 10005 - Plaintiffs' purchase of CEC

stock, debentures and warrants; receipt of UEC warrants

Chris McNeur - 315 Madison Avenue, New York, NY 10017 - Plaintiffs' purchase of

CEC stock, debentures and warrants; receipt of UEC warrants

David Holbrooke - 120 Buckley Avenue, Sausalito, CA 94965 - Plaintiffs' purchase

of CEC stock, debentures and warrants; receipt of UEC warrants

Eric Kline, Semple, Marchal & Cooper, 2700 North Central Avenue, Phoenix AZ -

valuation of CEC stock

Ernst & Young, Vancouver CA - valuation of CEC stock

II. (a)(1)(A)(ii) A copy of, or a description by category and location of all documents, data, compilations, and tangible things that are in the possession, custody, or control of the party that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

1. Transaction documents relating to Plaintiffs' acquisition of CEC Stock and Warrants.
2. Emails and correspondence between Plaintiffs and i) CEC, and its officers, directors, employees, attorneys and agents and ii) UEC, and its officers, directors, employees, attorneys and agents relating to merger, acquisition of UEC Warrants and matters relating to the CEC and UEC Warrants.

All documents are located at the premises of the Plaintiffs.

III. (a)(1)(A)(iii) a computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which the computation is based, including materials bearing on the nature and extent of injuries suffered.

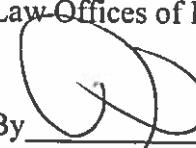
Plaintiffs' damages are calculated based upon the effective price at which CEC issued shares in August 2009 and April 2010. Such price would have reduced the exercise price of the CEC Warrants held by Plaintiffs and increased the number of shares into which those Warrants were exercisable. Under the terms of the CEC Warrants, UEC, as CEC's successor, was bound to honor all the terms of the CEC Warrants, including the ratchet down and cashless exercise

provisions thereof. Based upon an effective price of \$0.001 per share for the CEC share issuances in August 2009 and April 2010, and based upon a merger ratio of 9.3:1 between CEC shares and UEC shares, and the exercise price of the CEC Warrants and the UEC Warrants, UEC, at the time the merger between CEC and UEC closed in September, 2011, should have issued 70,359,774 UEC Warrants to Plaintiffs exercisable at \$0.011 per share. Upon termination of the Warrants on December 31, 2012, UEC should have issued 70,049,628 freely trading shares of stock to Plaintiffs.

IV. (a)(1)(A)(iv) Applicable Insurance Agreements

Not applicable.

Dated: New York, New York
November 30, 2015

Law Offices of Kenneth A. Zitter

By _____
Kenneth A. Zitter, Esq.
Attorneys for Plaintiffs
Westminster Securities Corporation,
David R. Holbrooke, M.D., AWM
Holdings, LLC and John O'Shea
260 Madison Avenue, 18th Floor
New York, New York 10016
212-532-8000
KAZ-3195